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Interim Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE TRANSPACIFIC PASSENGER
AIR TRANSPORTATION ANTITRUST
LITIGATION**

Civil Case No. 3:07-cv-05634-CRB-DMR
MDL No. 1913

This Document Relates to:
All Actions

**STIPULATION AND [PROPOSED] ORDER
RE DEPOSITION LIMITS**

Judge: Hon. Donna M. Ryu
Date: February 14, 2013
Time: 11:00 a.m.

1 WHEREAS, the parties have met and conferred concerning limits on the number of
2 depositions to be taken in this case and have agreed as follows:

3 1. Plaintiffs and Defendants may take a total of 90 depositions per side.

4 2. No more than 10 (including 30(b)(6)) depositions may be conducted by one side of
5 deponents related to a single party on the opposing side, except that this limitation shall not apply
6 to any party which has pled guilty to violating the Sherman Act in relation to the provision of
7 Transpacific passenger air transportation or to former employees of a single party who are not
8 represented by counsel for the party. The limit on depositions related to a single party which has
9 pled guilty to violating the Sherman Act in relation to the provision of Transpacific passenger air
10 transportation shall be 15.

11 3. Rule 30(a)(2)(A)(ii) and the seven hour presumptive limit of Rule 30(d)(1) shall
12 apply to all depositions, except that depositions for which interpreters are used shall have a nine
13 hour presumptive limit.

14 4. The foregoing limitation of 90 depositions per side shall not include any
15 depositions of expert witnesses.

16 5. Any limitations set forth above may be modified by agreement of the parties or
17 upon a showing of good cause to the Court after appropriate efforts to resolve disputes between
18 the parties have been made.

19 Dated: February 13, 2013

Respectfully submitted,

20 By: /s/ Steven N. Williams

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ATTESTATION OF FILING

I, Steven N. Williams, hereby attest, pursuant to Northern District of California, Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.

/s/ Steven N. Williams

Steven N. Williams

SO ORDERED.

Dated: February 14, 2013

